## JOHN SEXTON CONTRACTORS CO.



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Ms. Ann L. Carr Assistant Attorney General Environmental Control Division 500 South Second Street Springfield, Il. 62706

RE: Peoria/Janson Solid
Waste Disposal Facility

Dear Ms. Carr:

Pursuant to your verbal request for an additional report for your use and that of the State's Attorney of Peoria County, also rendered to be helpful as a neutral influential party for the Circuit Court of Peoria County. It is our intent that this information be used to ameliorate the existing conditions and not as testimony for any criminal action you may file against Charles Janson.

In order to proceed with the control of hot spots at this site without accomplishing the subsurface investigations previously described, a determination of an earth cover material source and a clear area upon which to extinguish the fires must be determined. To search for cover material and/or determine the presence of hot spots within the center portion of the site using a backhoe, dragline or end loader entails a number of risks not presented by the boring procedure.

1) Only conditions within a few feet of the excavation can be determined and the number of possible examinations to undisturbed earth will be considerably reduced, thus the evaluation of subsurface conditions will be based on less data and be less reliable. 2) Exposure of a hot spot may allow oxygen to reach the source and the fire may become larger in extent making further work difficult if not impossible. 3) Heavy equipment may collapse burned out portions of the fill trapping the equipment and personnel. 4) If hydraulic equipment is used, the increase in temperature may cause hose to rupture and oil to burn. 5) Exposure of hazardous or toxic chemicals, if any, will be in all probability greater and less controllable.

If it is elected to proceed with the project using earth moving equipment, the following procedures will, in my opinion, provide a reasonable degree of success if executed carefully. However, much of the ability to correct the site using this method depends upon the operators ability to determine the location of "hot spots" prior to their full exposure to air, etc.

Step 1. - - Excavate four or more locations within the center of the site (Marked BH-1 to BH-4) on the revised plan view. Excavations must be made through the entire refuse depth to undisturbed earth.

If no "hot spots" are located, an earth fire stop must be constructed through the entire fill depth around the perimeter of the interior section in preparation for extinguishing hot materials from the berm. The area surrounded should then receive 6" to 8" of compacted earth cover.

If one or more of the excavations reveals "hot spots" within the center section, either a smaller area must be fire stopped and capped or another location of adequate dimension must be found on the site.

See Section A-A enclosed exhibit.

Step 2. - - Upon completion of fire stopping and capping of an acceptable working area, the sequential removal of all existing refuse shall be made.

The routine will include excavation, movement to the capped work area or an area previously excavated to original earth grade, spreading, wetting, rolling, tramping or smothering with earth until all signs of fire and excessive heat are eliminated.

Step 3. - - Cover the extinguished materials with a thin layer of soil compacted in place in preparation for a repetition of the process using the same location until a final grade is achieved which will provide adequate surface drainage without excessive erosion.

CAUTION

It is essential that the excavated materials are isolated from extinguished materials at all times. No placement of excavated materials should be made on extinguished materials without an intervening layer of compacted earth. There should be no placement of extinguished materials on unexcavated wastes except where it can be proven that the in-place materials are not on fire and are isolated from any portion of the waste which is on fire or contains "hot spots".

- 3 -

The procedure above, though adequate, will not provide the degree of knowledge and ability to pre-plan as will be obtained through the proposed boring program. We believe that the boring plan, though initially expensive, may prove to be the more economical and expedient method of obtaining the desired results.

If, as has been reported, the EPA has little concern for water quality at, adjacent to, and beneath this site, another alternative might be considered. With an adequate water supply, that area within the berm might be totally inundated to berm heighth. By maintaining such a level for an adequate period of time the berms may become thoroughly saturated and the "hot spots" snuffed out. (Previous attempts with water consisted of small capacity pumps with limited coverage). This procedure has considerable potential for increasing pollutants in the surface and ground waters adjacent to the site but might result in the least expensive problem solution.

If the basin required to contain the water is not adequate, some sealing of berms on the outside perimeter may be required. Permeability of the basin bottom and berms cannot be determined at this time. The quantity of water required will be slightly in excess of that which penetrates the berms and bottom. Should the berms be in poor condition or the bottom be extremely permeable, one of the previously described alternatives would be more appropriate.

We hope that our comments are received as helpful and constructive suggestions to correct the site's problem.

Should you need additional information, please contact me.

Very truly yours,

JOHN SEXTON CONTRACTORS CO.

Arthur A. Daniels

Executive Vice President

AAD:ms encls.